

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO.: 4:22-cr-00580-JD

vs.

MOTION TO MODIFY BOND

**BHAGAVAN MAHAMAYAVI ANTLE
a/k/a KEVIN ANTLE a/k/a DOC ANTLE**

The United States of America (hereinafter “the Government”), by and through its undersigned attorney, hereby respectfully submits this Motion to Modify Bond. Specifically, the Government has recently been informed by the USDA that that Defendant Antle is attempting to sell Myrtle Beach Safari (851 Folly Ranch Ln., Myrtle Beach, SC, 29588) to Sugriva Co LLC. This LLC was created on June 10, 2022, while Defendant Antle was in custody, and is owned by China York, who lives at the Safari Park. The registered address of Sugriva is the same address as the Safari Park. USDA was informed of the sale by Ms. York’s attorneys as she has now applied for an Animal Welfare Act license. *See* York Letter, attached as Exhibit A.

This sale will encumber property that could be subject to seizure and would by default transfer ownership and control of many of the animals at issue in this case. Should the sale occur, animals and other property that are evidence and subject to forfeiture would be owned and controlled by a non-party to this criminal case. *See* York Letter (casting doubt on whether Defendant will even be employed by the Safari Park after the transfer and making it “absolutely clear that Bhagavan (Doc) Antle will have no ownership or leadership role in operating Sugriva Co LLC” and that he will have no interest in the applicable license).

Accordingly, the Government believes that the Court should modify the bond in any manner it deems appropriate, and specifically require that Defendant Antle (1) not be permitted to transfer title of the Myrtle Beach Safari Park, and (2) not be permitted to transfer any animal listed under the Endangered Species Act.

RESPECTFULLY SUBMITTED,

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

BY: /s/ Derek A. Shoemake
Derek A. Shoemake (Fed. Id. 10825)
Assistant U.S. Attorney
401 West Evans Street, Room 222
Florence, South Carolina 29501
(843) 665-6688
Derek.Shoemake@usdoj.gov

Florence, S.C.
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